

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES AND
PRODUCTS LIABILITY LITIGATION

MDL No. 2738 (MAS) (RLS)

This Document Relates To All Cases

**NOTICE OF DEFENDANTS' MOTION OBJECTING TO SPECIAL
MASTER'S OPINION RELATED TO PLAINTIFFS' RENEWED MOTION
FOR LEAVE TO FILE SECOND AMENDED MASTER LONG FORM
COMPLAINT**

PLEASE TAKE NOTICE that on February 20, 2024, or as soon thereafter as counsel may be heard, the undersigned defendants' counsel shall move pursuant to the Court's September 11, 2017 Order Regarding Special Master's Duties and Authority (Dkt. No. 704) and March 23, 2021 Order Appointing Special Master (Dkt. No. 18360) for an entry of Order vacating: (1) the Special Master's January 10, 2024 Opinion and Special Master Order No. 17 (Deciding Plaintiffs' Motion to Amend) (Dkt. No. 28902), and (2) denying the Plaintiffs' Renewed Motion for Leave to File a Second Amended Master Long Form Complaint (Dkt. No. 26636), for the reasons explained in the Memorandum in Support filed herewith.

PLEASE TAKE FURTHER NOTICE that in support of their motion, the undersigned defendants shall rely upon the Memorandum of Law in Support

submitted herewith, and any reply submissions made hereafter and the Certification of Susan Sharko, Esq. together with exhibits; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: January 24, 2024

By: /s/ Susan M. Sharko

Susan M. Sharko

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